

82704

DEPT. OF TRANSPORTATION  
DOCKETS

BEFORE THE  
U.S. DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C.

00 JUN -5 PM 2:09

In the matter of  
THE WENDELL H. FORD AVIATION  
INVESTMENT AND REFORM ACT FOR  
THE 21<sup>st</sup> CENTURY

For exemptions from 14 C.F.R. Part 93, under  
49 U.S.C. § 41718(a) (beyond-perimeter slot  
exemptions for Reagan National Airport)

Docket OST-2000-7181-53

MOTION OF  
NATIONAL AIRLINES, INC.

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National Airlines, Inc.

Dated: June 5, 2000

BEFORE THE  
U.S. DEPARTMENT OF TRANSPORTATION  
OFFICE OF THE SECRETARY  
WASHINGTON, D.C.

In the matter of

THE WENDELL H. FORD AVIATION  
INVESTMENT AND REFORM ACT FOR  
THE 21<sup>st</sup> CENTURY

For exemptions from 14 C.F.R. Part 93, under  
49 U.S.C. § 41718(a) (beyond-perimeter slot  
exemptions for Reagan National Airport)

Docket OST-2000-7181  
June 5, 2000

MOTION OF  
NATIONAL AIRLINES, INC.

Pursuant to Rule 11 of the Department's Rules of Practice, National Airlines, Inc. ("National") hereby moves to strike certain incorrect factual assertions that America West Airlines, Inc. ("America West") included in the comments it filed in this proceeding on May 22, 2000 1/ regarding National's fare structure and its financial performance.

Only the most compelling circumstances would cause National to request the Department to reopen the record subsequent to the pleading deadline. Regrettably, however, if not stricken, the misstatements submitted by America West could mislead the decisionmakers and unfairly prejudice

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1/ Consolidated Comments of America West Airlines, filed in Docket OST-2000-7181 on May 22, 2000 (the "AW Comments").

National's prospects for an award of beyond-perimeter slot exemptions at Ronald Reagan Washington National Airport ("DCA").

In support of this Motion, National submits the following.

1. Carriers in proceedings before the Department must ensure that some credible basis exists for the factual assertions they submit. If they fail to do so, the Department should protect the integrity of its proceedings by expunging the unsupported statements from the record.

2. In this case, America West has degraded the Department's administrative record by including two factual misrepresentations in its challenge to National's application for slot exemptions at DCA.

3. First, America West asserts that its "fares are lower, in some cases significantly lower, than fares offered by National . . . in several markets where America West competes with [it]," and that National's fares are "higher than America West's in competitive markets." <sup>2/</sup> However, the fare comparisons contained in Exhibit 1 show that America West's fares are not lower than the fares offered by National, and that, more often, it is

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<sup>2/</sup> See AW Comments at 5, 7; id. at 23 ("America West's fares from the East Coast to the West Coast are comparable to or lower than those of ATA, Frontier and National."); id. at 24 ("America West's fares are comparable, and. . . in many cases lower than the other new entrants.").

National that offers the lower fare. 3/ Indeed, of the many fares compared in Exhibit 1, there is only one instance where America West offers a fare that is lower than National's closest comparable fare. 4/

4. America West made a second objectionable and incorrect assertion when it stated that "National's LAS service would prove unprofitable as have other operations tried by National." 5/ Since National is privately held, America West lacks access to its financial reports. Nevertheless, America West can be presumed to know that National is

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3/ America West also asserts that its average fares for markets out of New York JFK are "considerably" lower than National's average fares. See AW Comments at 19-20 (claiming that "in multiple markets out of New York JFK served by both America West and National, National's fares are considerably higher than those of America West;" citing rebuttal exhibit); id. Rebuttal Exhibit 12 (providing average fare data for the JFK services). This assertion misrepresents National's fare structure because, as discussed above, America West does not offer cheaper rates than National. Moreover, America West fails to acknowledge that National's average fare levels naturally tend to be somewhat higher than America West's average fares because National's fleet contains relatively more first class seats, and because National's typically lower unrestricted first class and coach fares attract more last-minute passengers than America West's unrestricted fares.

4/ See Exhibit 1 at 4 (inventory-controlled walk-up fare for Los Angeles-Dallas).

5/ AW Comments at 19 (emphasis added; also suggesting that National, like TWA, is one of the "carriers with financial problems").

profitable, as was widely heralded in the general press shortly before America West surprisingly told the Department the exact opposite. 6/

Conclusion

National and America West are competing applicants for DCA-Las Vegas slot exemptions in this proceeding. By misstating the comparative qualifications of the two applicants, America West may have hoped to gain an edge in obtaining beyond-perimeter slot exemptions instead of National. Such action does a disservice to the Department's decisionmakers, to National, and to the other participants in this proceeding, and must not be allowed to stand.

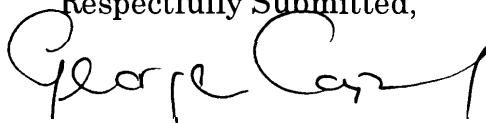
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6/ See, e.g., National Posts Early Profit as Fleet, Network Expand, Aviation Daily, May 10, 2000, at 3 ("National Airlines achieved profitability in March, 10 months after it launched operations from its Las Vegas hub, becoming one of the fastest new entrants in modern history to make money.").

- 5 -

WHEREFORE, National Airlines, Inc. requests that the Department strike the incorrect factual statements that America West made in its comments in this proceeding, and grant such further relief as the Department deems appropriate.

Respectfully Submitted,



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Counsel for  
National Airlines, Inc.

Dated: June 5, 2000

# **COMPARISON OF FARES OFFERED BY NATIONAL AIRLINES (N7) VERSUS AMERICA WEST (HP)**

## **LAS-LAX**

		<b>N7</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>N7</b>	<b>Fare Class</b>	<b>Fare Basis</b>	<b>Q/W</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>Q/W</b>	<b>R/T</b>		
7-day AP, sale fare (off peak)	7-day AP, sale fare (off peak)	LLR7NR		68	MSR71NW		68	0.0%	1
7-day AP, sale fare	7-day AP, sale fare	LR7ANVNR		78	MR71NQ		78	0.0%	2
7-day AP	7-day AP	MR7NR		88	MR71N9		88	0.0%	
14-day AP	14-day AP	K14NR	60	120	VA14N9	60	120	0.0%	
7-day AP	7-day AP	KR7NR		154	VR71N9		154	0.0%	
inventory-controlled walk-up	inventory-controlled walk-up	V	84	168	V9	84	168	0.0%	
inventory-controlled walk-up	inventory-controlled walk-up	Q	104	208	K	107	214	-2.8%	
inventory-controlled walk-up	inventory-controlled walk-up	Q	104	208	Q	137	274	-24.1%	
	21-day AP				BE21NV		338		
	inventory-controlled Comdex fare				HCMX	226	452		
unrestricted walk-up	unrestricted walk-up	Y7	124	248	Y6	226	452	-45.1%	
	unrestricted walk-up Comdex fare				YCMX	301	602		
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	174	348	YUP6	278	556	-37.4%	
unrestricted first class	unrestricted first class	F7	199	398	F6	348	696	-42.8%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	506	1012	Y	562	1124	-10.0%	
first class pro-rate fare	first class pro-rate fare	F	668	1336	F	744	1488	-10.2%	

Source: Sabre

**Notes:**

1. Travel complete 27OCT00
2. Travel complete 31AUG00

**LAS-SFO**

		<b>N7</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>N7</b>	<b>Fare Class</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>		
7-day AP, sale fare	7-day AP, sale fare	LR7ANVNR		118	MR71NQ		118	0.0%	1 -Jan
14-day AP	14-day AP	MR14NR		134	VR141N		134	0.0%	
7-day AP	7-day AP	MR7NR		154	VR71N9		154	0.0%	
14-day AP, OW	14-day AP, OW	K14NR	86	172	VA14N9	86	172	0.0%	
7-day AP	7-day AP	KR7NR		192	KR71N9		192	0.0%	
7-day AP	7-day AP	KR7NR		192	LR71N9		240	-20.0%	
	3-day AP				QA3N	137	274		
inventory-controlled walk-up	inventory-controlled walk-up	V	117	234	Q	157	314	-25.5%	2
inventory-controlled walk-up	inventory-controlled walk-up	Q	137	274	W	207	414	-33.8%	3
unrestricted walk-up	unrestricted walk-up		157	314	Y6	269	538	-41.6%	
	inventory-controlled Comdex fare				HCMX	269	538		
unrestricted walk-up	unrestricted walk-up	Y7	157	314	Y6	325	650	-51.7%	
	unrestricted walk-up Comdex fare				YCMX	344	688		
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	207	414	YUP6	269	538	-23.0%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	207	414	YUP6	377	754	-45.1%	
unrestricted first class	unrestricted first class	F7	232	464	F6	407	814	-43.0%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	618	1236	Y	652	1304	-5.2%	
first class pro-rate fare	first class pro-rate fare	F	639	1278	F	694	1388	-7.9%	

**Notes:**

1. Travel complete 31AUG00
2. Inventory-controlled walk-up less than HP's 7-day AP fare
3. Inventory-controlled walk-up the same as HP's 3-day AP fare



**LAS-DFW**

		N7			HP			Difference	Notes
	Fare Class	Fare Basis	O/W	R/T	Fare Basis	O/W	R/T		
7-day AP, off-peak	7-day AP, off-peak	KOR7NR		258	LOR71N		258	0.0%	1
7-day AP, sale fare	7-day AP, sale fare	KR7ANVNR		268	QR71NQ		268	0.0%	
7-day AP, peak	7-day AP, peak	KPR7NR		288	QPR71N		288	0.0%	
7-day AP	7-day AP	VR7NR		338	QR71N		338	0.0%	
7-day AP	7-day AP	QR7NR		388	BR71N		388	0.0%	
	7-day AP, "Las Vegas nights"				WNLE7LVN		431		
	7-day AP, "Las Vegas nights"				WNHE7LVN		453		
	21 day AP , Tue-Wed only				WZE21NV		531		
3-day AP	3-day AP	HA3	266	532	WA3	266	532	0.0%	
	21-day AP				HE21NV		572		
inventory-controlled walk-up	inventory-controlled walk-up	B	316	632	W	316	632	0.0%	
	14-day AP , Tue-Wed only				HZE14NV		686		
	14-day AP				HE14NV		742		
inventory-controlled walk-up	inventory-controlled walk-up	B	316	632	H	444	888	-28.8%	
unrestricted walk-up	unrestricted walk-up	Y7	386	772	Y6	691	1382	-44.1%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	486	972	YUP6	802	1604	-39.4%	
unrestricted first class	unrestricted first class	F7	536	1072	F6	1131	2262	-52.6%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1030	2060	Y	1096	2192	-6.0%	
first class pro-rate fare	first class pro-rate fare	F	1448	2896	F	1526	3052	-5.1%	

**Notes:**

1. Travel complete 31AUG00

**LAX-DFW**

		<b>N7</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>N7</b>	<b>Fare Class</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>		
7-day AP, sale fare		VR7ANVNR		298					1
	21-day AP time-restricted fare				BE21TVN		328		
14-day AP		VR14NR		328					
	14-day AP time-restricted fare				BE14TVN		368		
7-day AP		QR7NR		368					
	14-day AP sale fare				BE14ND		378		2
7-day AP		HR7NR		418					
	7-day AP time-restricted fare				WE7TVN		418		
	21 day AP , Tue-Wed only				HZE21NV		554		
	21-day AP				HE21NV		597		
3-day AP		BA3	314	628					
inventory controlled walk-up	inventory controlled walk-up	B	384	768	WR		614	25.1%	
	14-day AP , Tue-Wed only				HZE14NV		708		
	14-day AP				HE14NV		765		
inventory-controlled walk-up	inventorycontrolled walk-up	B	384	768	H	490	980	-21.6%	
	night restricted first class upgrade based on Y availability				YNUP	649	1298		
	night restricted first class				FN	760	1520		
unrestricted walk-up	unrestricted walk-up	Y7	464	928	Y6	927	1854	-49.9%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	564	1128	YUP6	927	1854	-39.2%	
unrestricted first class	unrestricted first class	F7	689	1378	F6	1109	2218	-37.9%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1140	2280	Y	1209	2418	-5.7%	
first class pro-rate fare	first class pro-rate fare	F	1611	3222	F	1694	3388	-4.9%	

**Notes:**

1. Travel complete 31AUG00
2. Travel complete 1 0SEP00

**SFO-DFW**

		N7			HP				
Fare Class		Fare	Fare		Fare				
N7	HP	Basis	Q & Y	R/T	Basis	Q/W	R/T	Difference	Notes
7-day AP, sale fare		VR7ANVNR		298					1
14-day AP		VR14NR		328					
	14-day AP, sale fare				WE14ND		353		2
7-day AP		QR7NR		368					
7-day AP		HR7NR		418					
	21-day AP , Tue-Wed only				HZE21NV		574		
	21-day AP				HE21NV		621		
3-day AP		BA3	314	628					
	14-day AP , Tue-Wed only				HZE14NV		751		
	14-day AP				HE14NV		814		
	inventory-controlled walk-up, night only				HN	432	864		
inventory-controlled walk-up	inventory-controlled walk-up	B	384	768	H	476	952	-19.3%	
	night restricted first class upgrade based on Y availability				YNUP	583	1166		
	night restricted first class				FN	659	1318		
unrestricted walk-up	unrestricted walk-up	Y7	464	928	Y6	956	1912	-51.5%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	564	1128	YUP6	956	1912	-41.0%	
unrestricted first class	unrestricted first class	F7	689	1378	F6	1137	2274	-39.4%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1129	2258	Y	1198	2396	-5.8%	
first class pro-rate fare	first class pro-rate fare	F	1677	3354	F	1762	3524	-4.8%	

**Notes:**

1. Travel complete 31AUG00
2. Travel complete 1 0SEP00

**LAS-MDW**

		<b>N7</b>			<b>HP</b>				
<b>Fare Class</b>		<b>Fare</b>			<b>Fare</b>				
<b>N7</b>	<b>HP</b>	<b>Basis</b>	<b>Q/W</b>	<b>R/T</b>	<b>Basis</b>	<b>Q/W</b>	<b>R/T</b>	<b>Difference</b>	<b>Notes</b>
7-day AP, off-peak sale fare	7-day AP, off-peak sale fare	LLR7NR		178	VSR71NW		178	0.0%	1
14-day AP sale fare	14-day AP sale fare	MR14NR		258	LR141N		258	0.0%	1
7-day AP sale fare	7-day AP sale fare	KR7ANVNR		278	QR71NZ		278	0.0%	2
14-day AP	14-day AP	VR14NR		298	QR141N		298	0.0%	
7-day AP	7-day AP	VR7NR		338	BR71N		338	0.0%	
7-day AP	7-day AP	QR7NR		388	WE7N		388	0.0%	
14-day AP, OW	14-day AP, OW	Q14NR	211	422	WA14N	211	422	0.0%	
14-day AP, OW	14-day AP, OW	Q14NR	211	422	WE14N		496	-14.9%	
3-day AP	3-day AP	HA3	256	512	WA3	256	512	0.0%	
	7-day AP, 6:15-6:59AM Mon-Fri only				HR71N9		550		
inventory-controlled walk-up	inventory-controlled walk-up	B	306	612	W	306	612	0.0%	
	21-day AP , Tue-Wed only				HZE21NV		631		
	21-day AP				HE21NV		682		
	28-day AP				HR281N		786		
	14-day AP , Tue-Wed only				HZE14NV		828		
	inventory-controlled walk-up, night only				HN	419	838		
	14-day AP				HE14NV		898		
inventory-controlled walk-up	inventory-controlled walk-up	B	306	612	H	517	1034	-40.8%	
unrestricted walk-up	unrestricted walk-up	Y7	376	752	Y6	840	1680	-55.2%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	476	952	YUP6	995	1990	-52.2%	
unrestricted first class	unrestricted first class	F7	526	1052	F6	1317	2634	-60.1%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1197	2394	Y	1305	2610	-8.3%	
first class pro-rate fare	first class pro-rate fare	F	1796	3592	F	1941	3882	-7.5%	

**Notes:**

1. Travel complete 27OCT00
2. Travel complete 31AUG00

**LAX-MDW**

		<b>N7</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>N7</b>	<b>Fare Class</b>	<b>Fare Basis</b>	<b>OW</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>OW</b>	<b>R/T</b>		
7-day AP		MR7NR		248					
7-day AP sale fare		VR7ANVNR		298					1
	21 day AP				BR21N		378		
	21 day AP				BR21N		378		
	14-day AP, Fri-Mon				BE14N		378		
14-day AP	14-day AP	QR14NR		378	WE14N		514	-26.5%	
	14-day AP, 3-day min stay				WR14A3N		612		
	21 day AP, Tue-Wed only				HZE21NV		642		
14-day AP, OW	14-day AP	H14NR	236	472	HE14N		676	-30.2%	
	28-day AP				HR281N		684		
	21-day AP				HE21NV		692		
7-day AP	7-day AP	HR7NR		548	HE7N		802	-31.7%	
3-day AP		BA3	299	598					
	14-day AP Tue-Wed only				HZE14NV		900		
inventory-controlled walk-up	inventory-controlled walk-up	B	369	738	H	473	946	-22.0%	
	14-day AP				HE14NV		974		
	night restricted walk-up				YN	568	1136		
	night restricted first class upgrade based on Y availability				YNUP	620	1240		
	night restricted first class				FN	667	1334		
unrestricted walk-up	unrestricted walk-up	Y7	454	908	Y6	1073	2146	-57.7%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	554	1108	YUP6	1073	2146	-48.4%	
unrestricted first class	unrestricted first class	F7	679	1358	F6	1489	2978	-54.4%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1306	2612	Y	1425	2850	-8.4%	
first class pro-rate fare	first class pro-rate fare	F	1948	3896	F	2102	4204	-7.3%	

**Notes:**

1. Travel complete 31AUG00

**SFO-MDW**

		<b>N7</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>N7</b>	<b>Fare Class</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>		
7-day AP sale fare		VR7ANVNR		298					1
	14-day AP, Fri-Mon				QE14N		298		2
	14-day AP, Fri-Mon				BE14N		348		
14-day AP	14-day AP	QR14NR		388	HE14N		668	-41.9%	
	21 day AP , Tue-Wed only				HZE21NV		692		
	21 day AP				HE21NV		742		
	28-day AP				HR281N		785		
7-day AP	7-day AP	HR7NR		454	HE7N		842	-46.1%	
14-day AP OW		H14NR	246	492					
7-day AP	7-day AP	BR7NR		566	HE7N		842	-32.8%	
3-day AP		BA3	299	598					
	inventory-controlled walk-up, night only				HN	440	880		
	14-day AP Tue-Wed only				HZE14NV		950		
	14-day AP				HE14NV		1024		
inventory-controlled walk-up	inventory-controlled walk-up	B	369	738	H	608	1216	-39.3%	
	night restricted walk-up				YN	762	1524		
	night restricted first class upgrade based on Y availability				YNUP	784	1568		
	night restricted first class				FN	886	1772		
unrestricted walk-up	unrestricted walk-up	Y7	454	908	Y6	1123	2246	-59.6%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	554	1108	YUP6	1123	2246	-50.7%	
unrestricted first class	unrestricted first class	F7	679	1358	F6	1434	2868	-52.6%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1318	2636	Y	1438	2876	-8.3%	
first class pro-rate fare	first class pro-rate fare	F	1988	3976	F	2144	4288	-7.3%	

**Notes:**

1. Travel complete 31AUG00
2. Travel complete 27OCT00

**LAS-JFK**

		N7			HP				
Fare Class		Fare			Fare				
N7	HP	Basis	Q/W	R/T	Basis	Q/W	R/T	Difference	Notes
7-day AP	7-day AP	MR7NR		278	QR71N		278	0.0%	
7-day AP sale fare		KR7ANVNR		288					1
14-day AP, off-peak	14-day AP, off-peak	VOR14NR		308	QRO141NZ		308	0.0%	
14-day AP, peak	14-day AP, peak	VPR14NR		318	QRP141NZ		318	0.0%	
7-day AP	7-day AP	QR7NR		358	BR71N		358	0.0%	
7-day AP	7-day AP	HR7NR		408	WR71N		408	0.0%	
	21-day AP				WE21N		438		
	14-day AP				WE14N		498		
3-day AP	3-day AP	HA3	264	528	WA3	269	538	-1.9%	
	21-day AP, Tue-Wed only				HZE21NV		640		
	21-day AP				HE21NV		692		
	7-day AP, night only OW				HNAP7	347	694		
inventory-controlled walk-up	inventorycontrolled walk-up	B	354	708	W	354	708	0.0%	
	14-day AP Tue-Wed only				HZE14NV		861		
	14-day AP				HE14NV		933		
	7-day AP, OW				HA7	489	978		
3-day AP	3-day AP	HA3	264	528	YA3	901	1802	-70.7%	
unrestricted walk-up	unrestricted walk-up	Y7	464	928	Y6	1001	2002	-53.6%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	614	1228	YUP6	1098	2196	-44.1%	
unrestricted first class	unrestricted first class	F7	689	1378	F6	1198	2396	-42.5%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1306	2612	Y	1420	2840	-8.0%	
first class pro-rate fare	first class pro-rate fare	F	1904	3808	F	2152	4304	-11.5%	

**Notes:**

1. Travel complete 31AUG00

**LAX-JFK**

		<b>N7</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>N7</b>	<b>Fare Class</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>		
7-day AP sale fare		VR7ANVNR		318					1
14-day AP		VR14NR		348					
7-day AP		QR7NR		408					
	21-day AP				WE21N		438		
	14-day AP, night only				WE14TVN		456		
7-day AP		HR7NR		488					
	14-day AP				WE14N		498		
	7-day AP				WR7N		598		
	21-day AP, Tue-Wed only				HZE21NV		692		
	21-day AP				HE21NV		754		
	14-day AP Tue-Wed only				HZE14NV		900		
	14-day AP				HE14NV		962		
inventory-controlled walk-up	inventorycontrolled walk-up	B	464	928	H	616	1232	-24.7%	
	night restricted first class upgrade based on Y availability				YNUP	746	1492		
	night restricted first class				FN	912	1824		
3-day AP	3-day AP	BA3	364	728	YA3	1063	2126	-65.8%	
unrestricted walk-up	unrestricted walk-up	Y7	564	1128	Y6	1163	2326	-51.5%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	714	1428	YUP6	1163	2326	-38.6%	
unrestricted first class	unrestricted first class	F7	814	1628	F6	1589	3178	-48.8%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1382	2764	Y	1539	3078	-10.2%	
first class pro-rate fare	first class pro-rate fare	F	2133	4266	F	2299	4598	-7.2%	

**Notes:**

1. Travel complete 31AUG00



**SFO-JFK**

		<b>N7</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>N7</b>	<b>Fare Class</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>		
	<b>HE!</b>								
7-day AP sale fare		VR7ANVNR		318					1
	21-day AP				WE21N		438		
14-day AP	14-day AP	VR14NR		348	WE14N		498	-30.1%	
7-day AP		QR7NR		408					
7-day AP		HR7NR		488					
	21-day AP, Tue-Wed only				HZE21NV		692		
	21-day AP				HE21NV		754		
	14-day AP Tue-Wed only				HZE14NV		900		
	14-day AP				HE14NV		962		
	14-day AP				HA14N	528	1056		
inventory-controlled walk-up	inventory-controlled walk-up	B	464	928	H	616	1232	-24.7%	
3-day AP	3-day AP	BA3	364	728	YA3	1063	2126	-65.8%	
unrestricted walk-up	unrestricted walk-up	Y7	564	1128	Y6	1163	2326	-51.5%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	714	1428	YUP6	1163	2326	-38.6%	
unrestricted first class	unrestricted first class	F7	814	1628	F6	1589	3178	-48.8%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1418	2836	Y	1539	3078	-7.9%	
first class pro-rate fare	first class pro-rate fare	F	2204	4408	F	2373	4746	-7.1%	

**Notes:**

1. Travel complete 31AUG00

LAS-PHL

Fare Class			NZ		Fare		NZ		Fare		HP		Notes	
NZ	HP		Basis	OW	R/T	Basis	OW	R/T	Basis	OW	R/T	Difference		
7-day AP sale fare		7-day AP sale fare	KR7ANVNR		268	QR71NZ		268			268	0.0%		
14-day AP, off-peak		14-day AP, off-peak	KOR14NR		298	QRO141NZ		298			298	0.0%		
14-day AP, peak		14-day AP, peak	VPR14NR		318	QRP141NZ		318			318	0.0%		
7-day AP		7-day AP	QR7NR		358	BR71N		358			358	0.0%		
7-day AP		7-day AP	HR7NR		408	WR71N		408			408	0.0%		
		7-day AP, night only				WNLE7LVN		438			438			
3-day AP		3-day AP	HA3	264	528	WA3	269	538			538	-1.9%		
		14-day AP				WE21N		580			580			
		21-day AP, Tue-Wed only				HZE21NV		640			640			
		21-day AP				HE21NV		692			692			
inventory-controlled walk-up		inventory-controlled walk-up	B	354	708	W	354	708			708	0.0%		
		14-day AP Tue-Wed only				HZE14NV		861			861			
inventory-controlled walk-up		inventory-controlled walk-up	B	354	708	H	454	908			908	-22.0%		
		14-day AP				HE14NV		933			933			
unrestricted walk-up		unrestricted walk-up	Y7	464	928	Y6	730	1460			1460	-36.4%		
unrestricted walk-up + first class upgrade fee		first class upgrade based on Y availability	Y7+UG	614	1228	YUP6	830	1660			1660	-26.0%		
unrestricted first class		unrestricted first class	F7	689	1378	F6	980	1960			1960	-29.7%		
main cabin pro-rate fare		main cabin pro-rate fare	Y	1306	2612	Y	1420	2840			2840	-8.0%		
first class pro-rate fare		first class pro-rate fare	F	1904	3808	F	2152	4304			4304	-11.5%		

Notes:

1. Travel complete 31AUG00

**LAX-PHL**

		N7			HP			Difference	Notes
N7	Fare Class	Fare Basis	O/W	R/T	Fare Basis	O/W	R/T		
7-day AP sale fare		KR7ANVNR		288					1
	14-day AP sale fare				QE14NZ		288		1
7-day AP off peak		VLR7NR		318					
7-day AP peak		VHR7NR		348					
	14-day AP, time restrictions				BE14TVN		358		
7-day AP		QR7NR		408					
7-day AP		HR7NR		488					
	21 day AP				WE21N		600		
	21-day AP, Tue-Wed only				HZE21NV		683		
3-day AP		BA3	364	728					
	21 day AP				HE21NV		739		
	14-day AP Tue-Wed only				HZE14NV		903		
	14-day AP				HE14NV		979		
inventorycontrolled walk-up	inventory-controlled walk-up	B	464	928	H	524	1048	-11.5%	
	night restricted first class upgrade based on Y availability				YNUP	756	1512		
	night restricted first class				FN	833	1666		
unrestricted walk-up	unrestricted walk-up	Y7	564	1128	Y6	1058	2116	-46.7%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	714	1428	YUP6	1058	2116	-32.5%	
unrestricted first class	unrestricted first class	F7	814	1628	F6	1308	2616	-37.8%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1376	2752	Y	1570	3140	-12.4%	
first class pro-rate fare	first class pro-rate fare	F	1974	3948	F	2371	4742	-16.7%	

**Notes:**

1. Travel complete 31AUG00

**SFO-PHL**

		<b>NZ</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>NZ</b>	<b>Fare Class</b>	<b>Fare Basis</b>	<b>Q/W</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>Q/W</b>	<b>R/T</b>		
7-day AP sale fare		KR7ANVNR		288					1
	14-day AP sale fare				QE14NZ		288		1
	14-day AP, time restrictions				QE14TVN		308		
7-day AP peak		VLR7NR		318					
7-day AP		VHR7NR		348					
7-day AP		QR7NR		408					
3-day AP		HR7NR		488					
	21 day AP				WE21N		580		
	21-day AP, Tue-Wed only				HZE21NV		696		
3-day AP		BA3	364	728					
	21 day AP				HE21NV		753		
	14-day AP Tue-Wed only				HZE14NV		917		
	14-day AP				HE14NV		994		
inventory-controlled walk-up	inventory-controlled walk-up	B	464	928	H	544	1088	-14.7%	
	night restricted first class upgrade based on Y availability				YNUP	763	1526		
	night restricted first class				FN	819	1638		
unrestricted walk-up	unrestricted walk-up	Y7	564	1128	Y6	1071	2142	-47.3%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	714	1428	YUP6	1071	2142	-33.3%	
unrestricted first class	unrestricted first class	F7	814	1628	F6	1321	2642	-38.4%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1376	2752	Y	1607	3214	-14.4%	
first class pro-rate fare	first class pro-rate fare	F	1974	3948	F	2429	4858	-18.7%	

**Notes:**

1. Travel complete 31AUG00

**LAS-MIA**

		<b>N7</b>			<b>HP</b>				
		<b>Fare Class</b>	<b>Fare</b>			<b>Fare</b>			
<b>N7</b>	<b>HE!</b>	<b>Basis</b>	<b>O/W</b>	<b>R/T</b>	<b>Basis</b>	<b>O/W</b>	<b>R/T</b>	<b>Difference</b>	<b>Notes</b>
7-day AP sale fare	7-day AP sale fare	KR7ANVNR		268	QR71NQ		268	0.0%	1
	14-day AP				QR141N		288		
14-day AP off peak	14-day AP off peak	KOR14NR		298	QRO141NZ		298	0.0%	
14-day AP peak	14-day AP peak	VPR14NR		318	QRP141NZ		318	0.0%	
7-day AP	7-day AP	QR7NR		358	BR71N		358	0.0%	
7-day AP	7-day AP	HR7NR		408	WR71N		408	0.0%	
	7-day AP, night only				BNLE7LVN		425		
	7-day AP, night only				WNHE7LVN		467		
3-day AP	3-day AP	HA3	264	528	WA3	264	528	0.0%	
	21-day AP				WE21N		549		
	7-day AP				HE7N		593		
	21-day AP, Tue-Wed only				HZE21NV		636		
	21 day AP				HE21NV		687		
inventory-controlled walk-up	inventory-controlled walk-up	B	354	708	W	354	708	0.0%	
	7-day AP				HE7N		839		
	14-day AP Tue-Wed only				HZE14NV		856		
inventory-controlled walk-up	inventory-controlled walk-up	B	354	708	H	454	908	-22.0%	
	4-day AP				HE14NV		928		
unrestricted walk-up	unrestricted walk-up	Y7	464	928	Y6	901	1802	-48.5%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	614	1228	YUP6	1057	2114	-41.9%	
unrestricted first class	unrestricted first class	F7	689	1378	F6	1151	2302	-40.1%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1306	2612	Y	1420	2840	-8.0%	
first class pro-rate fare	first class pro-rate fare	F	1892	3784	F	2152	4304	-12.1%	

**Notes:**

1. Travel complete 31AUG00

**LAX-MIA**

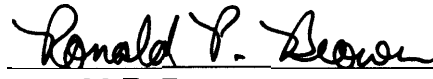
		<b>N7</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>N7</b>	<b>FareClass</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>		
7-day AP sale fare		KR7ANVNR		288					
7-day AP off peak		VLR7NR		318					
7-day AP peak		VHR7NR		348					
7-day AP		QR7NR		408					
7-day AP		HR7NR		488					
	21 day AP				WE21N		495		
	14-day AP				WE14NR		508		
	14-day AP, Tue-Wed only				HE14D23N		663		
	21 day AP, Tue-Wed only				HZE21NV		675		
	14-day AP, Thu-Mon only				HE14X23N		703		
3-day AP		BA3	364	728					
	21 day AP				HE21NV		729		
	14-day AP Tue-Wed only				HZE14NV		896		
	14-day AP				HE14NV		970		
inventory-controlled walk-up	inventory-controlled walk-up	B	464	928	H	603	1206	-23.1%	
	night restricted walk-up				YN	739	1478		
	night restricted first class upgrade based on Y availability				YNUP	739	1478		
	night restricted first class				FN	963	1926		
unrestricted walk-up	unrestricted walk-up	Y7	564	1128	Y6	1020	2040	-44.7%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	714	1428	YUP6	1020	2040	-30.0%	
unrestricted first class	unrestricted first class	F7	814	1628	F6	1270	2540	-35.9%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1392	2784	Y	1512	3024	-7.9%	
first class pro-rate fare	first class pro-rate fare	F	2092	4184	F	2293	4586	-8.8%	

**SFO-MIA**

		<b>N7</b>			<b>HP</b>			<b>Difference</b>	<b>Notes</b>
<b>N7</b>	<b>Fare Class</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>	<b>Fare Basis</b>	<b>O/W</b>	<b>R/T</b>		
7-day AP sale fare		KR7ANVNR		288					
7-day AP off peak		VLR7NR		318					
7-day AP peak		VHR7NR		348					
7-day AP		QR7NR		408					
	21-day AP				WE21N		454		
	14-day AP				HE14N		573		
7-day AP	7-day AP	HR7NR		488	HE7N		644	-24.2%	
	21-day AP, Tue-Wed only				HZE21NV		664		
	21-day AP				HE21NV		717		
3-day AP		BA3	364	728					
	14-day AP Tue-Wed only				HZE14NV		884		
	14-day AP				HE14NV		958		
inventorycontrolled walk-up	inventory-controlled walk-up	B	464	928	H	542	1084	-14.4%	
	night restricted first class upgrade based on Y availability				YNUP	604	1208		
	night restricted first class				FN	742	1484		
unrestricted walk-up	unrestricted walk-up	Y7	564	1128	Y6	1047	2094	-46.1%	
unrestricted walk-up + first class upgrade fee	first class upgrade based on Y availability	Y7+UG	714	1428	YUP6	1047	2094	-31.8%	
unrestricted first class	unrestricted first class	F7	814	1628	F6	1297	2594	-37.2%	
main cabin pro-rate fare	main cabin pro-rate fare	Y	1411	2822	Y	1532	3064	-7.9%	
first class pro-rate fare	first class pro-rate fare	F	2045	4090	F	2323	4646	-12.0%	

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing  
“Motion of National Airlines, Inc.” on all persons named on the attached  
Service List by causing a copy to be sent by first class mail, postage prepaid.

  
\_\_\_\_\_  
Ronald P. Brower

Dated: June 5, 2000

1077043



## **Service List**

### **America West**

Joanne W. Young  
David M. Kirstein  
Baker & Hostetler, L.L.P.  
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1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5304

### **American Airlines**

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### **American Trans Air**

Marshall S. Sinick  
Charles F. Donley  
Squire, Sanders & Dempsey L.L.P.  
P.O. Box 407  
Washington, D.C. 20044

### **Delta Air Lines**

Robert E. Cohn  
Sheryl R. Israel  
Shaw Pittman Potts & Trowbridge  
2300 N Street, N.W.  
Washington, D.C. 20037

### **Frontier Airlines**

Edward P. Faberman  
Michele M. Faust  
Ungaretti & Harris  
1500 K St., N.W. – Suite 250  
Washington, D.C. 20005-1714

### **Northwest Airlines**

Megan Rae Rosia  
Managing Director, Government Affairs  
& Associate General Counsel  
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901 15th Street, N.W., Suite 310  
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### **Trans World Airlines**

Glenn P. Wicks  
The Wicks Group, PLLC  
900 19<sup>th</sup> St., N.W. – Suite 350  
Washington, D.C. 20006

### **U.S. Airways**

Joel Burton  
Donald Bliss  
O'Melveny & Myers  
555 13th Street, N.W., Suite 500  
Washington, D.C. 20004-1109

### **United Air Lines**

Bruce H. Rabinovitz  
David Heffernan  
Wilmer, Cutler & Pickering  
2445 M Street, N.W.  
Washington, D.C. 20037-1420

### **Clark County Dept. of Aviation**

Bruce L. Woodbury, Chairman  
Clark County Board of Commissioners  
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Las Vegas, NV 89155-1744

Randall H. Walker  
Director of Aviation  
McCarran International Airport  
Clark County Department of Aviation  
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John F. Ash  
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Marcus G. Faust  
332 Constitution Ave., N.E.  
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**Reagan National Airport**

Edward S. Faggen  
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Metropolitan Washington  
Airports Authority  
1 Aviation Circle  
Washington, D.C. 20001

**City of Las Vegas**

The Honorable Oscar B. Goodman  
Mayor of the City of Las Vegas  
400 East Stewart Avenue  
Las Vegas, NV 89101

**City of Washington, D.C.**

The Honorable Anthony A. Williams  
Mayor of the City of Washington, D.C.  
441 4th Street, N.W.  
Washington, D.C. 20001

**State of Nevada**

The Honorable Kenny Guinn  
Governor of the State of Nevada  
Capitol Building  
Carson City, NV 89701

**State of Virginia**

The Honorable James S. Gilmore, III  
Governor of the State of Virginia  
Office of the Governor  
State Capitol, 3rd Floor  
Richmond, VA 23219